

UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF TENNESSEE
AT WINCHESTER

SKYMONT FARMS, DUSTY)	
WANAMAKER, ANTHONY WANAMAKER)	
AND CATERIA WANAMAKER,)	
)	
)	
)	
Plaintiffs,)	
)	Case No.: 4:09-CV-65
vs.)	
)	Judge Mattice/Lee
FEDERAL CROP INSURANCE)	
CORPORATION; RISK MANAGEMENT)	
AGENCY; UNITED STATES DEPARTMENT)	
OF AGRICULTURE; AND NAU COUNTRY)	
INSURANCE COMPANY,)	
)	
)	
Defendants.)	
)	
)	
)	

UNOPPOSED MOTION FOR EXTENSION OF TIME

Comes now the defendant United States of America, by and through James R. Dedrick, United States Attorney for the Eastern District of Tennessee, on behalf of its agency the United States Department of Agriculture (the "Agency") and, for the reasons stated herein, and without waiving any defenses, would move the Court for an extension of time, to and including October 9, 2009, in which defendant may file its answer to the plaintiff's complaint or otherwise plead. This case appears from the pleadings to be related to *Scruggs Farm Nursery, et. al. v. United States Department of Agriculture*, et. al. No. 4:09-CV-79; *Cain Field Nursery, et. al. v. Farmers Crop Insurance Alliance, Inc. et al.*, 4:09-CV-78, which were filed by the same law firm, and

consolidation may be appropriate. The answer date for these two cases is not earlier than October 9, 2009. Counsel for defendant has not received the files necessary to analyze the cases and determine a reasoned response. Due to the other two pending cases, the novel issues of law, and the apparent related nature of the claims, the undersigned needs additional time to locate and go over the Agency's file material and interview witnesses, including the Agency's personnel involved, all of whom apparently live out of state. The undersigned attorney has conferred with counsel for the plaintiffs in all three cases, and counsel for the other defendant in this case, and is authorized to represent that neither has any objection to this request for an extension.

Respectfully submitted,

JAMES R. DEDRICK
United States Attorney

s/M. Kent Anderson
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CERTIFICATE OF SERVICE

I hereby certify that on August 31, 2009, a copy of the foregoing Motion for Extension of Time was electronically filed. Notice of this filing will be sent by operation of the Court's electronic filing system to plaintiffs' attorney who is registered as a user of the electronic case filing system as indicated on the electronic filing receipt. Parties may access this filing through the Court's electronic filing system.

s/M. Kent Anderson
M. KENT ANDERSON
Assistant United States Attorney